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7 JETBLUE AIRWAYS CORPORATION

8 **UNITED STATES DISTRICT COURT**

9 **NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**

10
11 SHAWN GRANBERRY,

CASE NO. C 04 0845 JSW

12 Plaintiff,

13
14 vs.
15
16 **JETBLUE AIRWAYS,**
17 Defendant.

**STIPULATION AND ~~PROPOSED~~
ORDER TO EXTEND DEFENDANT'S
TIME TO RESPOND TO PLAINTIFF'S
SUPPLEMENTAL REQUEST FOR
PRODUCTION OF DOCUMENTS
BEYOND THE DISCOVERY CUTOFF
DATE**

18 The Hon. Jeffrey S. White, Dept. 2
19 Action Filed: March 1, 2004

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21 Discovery Cutoff: June 30, 2005
22 Motion Cutoff: September 9, 2005
23 Trial Date: November 28, 2005

24 WHEREAS, the fact discovery cutoff date is currently set on June 30, 2005;
25 WHEREAS, Defendant recently discovered the existence of backup tapes
26 containing documents which may be responsive to discovery propounded by
27 Plaintiff;

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C 04 0845 JSW
STIPULATION TO EXTEND TIME TO
RESPOND TO P'S REQUEST FOR
PRODUCTION OF DOCS

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1 WHEREAS, Defendant is only aware of the existence of the backup tapes,
2 but has not had an opportunity to locate or review the tapes for responsive
3 documents;

4 WHEREAS, Defendant requests a 30-day extension beyond the current
5 discovery cutoff date in order to locate and ascertain whether the tapes contain any
6 responsive documents; and

7
8 IT IS HEREBY STIPULATED by and between the parties to this action,
9 through their respective counsel, AND IT IS HEREBY REQUESTED OF THE
10 COURT that discovery shall remain open for a period of 30 days to July 30, 2005
11 for the limited purpose of Defendant providing supplemental responses to discovery

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1 and, if necessary, the reconvening of depositions solely for questioning concerning
2 the supplemental responses to discovery, i.e., responses provided after June 30,
3 2005.

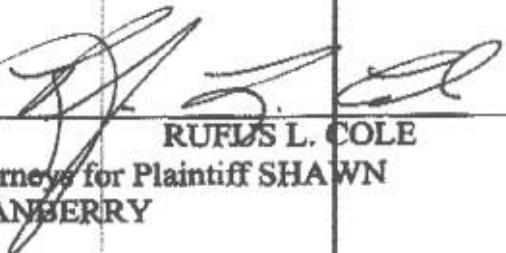
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5 DATED: June 29, 2005

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7 SWERDLOW FLORENCE
8 SANCHEZ SWERDLOW & WIMMER
9

10 By: 
11 DAVID A. WIMMER MELISSA A.
12 Attorneys for Defendant JETBLUE TURAL
13 AIRWAYS CORPORATION

14 DATED: June 29, 2005

15 COLE & FASANO
16

17 By: 
18 RUFLS L. COLE
19 Attorneys for Plaintiff SHAWN
20 GRANBERRY

21 IT IS SO ORDERED:
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23 Dated: June 30, 2005

24 /s/ Jeffrey S. White

25 The Honorable Jeffrey S. White
26 UNITED STATES DISTRICT COURT
27 JUDGE

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